

Exhibit 3

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

DONALD J. TRUMP FOR
PRESIDENT, INC., *et al.*,

Plaintiffs,

v.

KATHY BOOCKVAR, in her capacity
as Secretary of the Commonwealth of
Pennsylvania, *et al.*,

Defendants.

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) Civil Action No. 4:20-cv-02078-
) MWB
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) Judge Matthew W. Brann
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DECLARATION OF J. MANLY PARKS

I, J. Manly Parks, hereby declare as follows:

1. I serve as Solicitor for the Delaware County Bureau of Elections and Voter Registration Commission.
2. On October 28 and again on November 1, the Pennsylvania Department of State (“DOS”) issued guidance requiring county boards of election to segregate mail-in and absentee ballots received by 8 pm on Election Day (November 3) from mail-in and absentee ballots received by mail between 8 pm on Election Day and 5 pm on November 6. Delaware County received that guidance and immediately segregated the ballots accordingly.

3. In their Memorandum of Law seeking injunctive relief, Plaintiffs state that Delaware County “improperly commingled ballots” received after Election Day with ballots received on or before Election Day. Pl.’s TRO Mem. (ECF 183), p. 19.

4. That statement is false. From the time they were originally segregated, mail-in and absentee ballots received by Delaware County by mail after 8 pm on Election Day and before 5 pm on November 6 have remained segregated from the general population of other mail-in and absentee ballots. They remain segregated currently.

5. On November 19, the Chief Clerk of Delaware County transmitted our county’s vote tallies to the DOS in a document entitled “Certification of Computation of Election Results” (the “First Signing Certification.”) That document is attached hereto as Exhibit A.

6. Conclusively demonstrating that Delaware County properly segregated the ballots in question in accordance with DOS Guidance, the First Signing Certification contains separate tallies of (1) votes from ballots other than those received by mail after 8 pm on Election Day and before 5 pm on November 6 and (2) votes from mail-in and absentee ballots received by mail after 8 pm on Election Day and before 5 pm on November 6.

7. As reflected in the First Signing Certification, the total number of votes for Presidential candidates from ballots other than those received by mail after 8 pm on Election Day and before 5 pm on November 6 was 327,932 (206,423 for Joseph Biden, 118,532 for Donald Trump, and 2,976 for Jo Jorgensen). As reflected in the First Signing Certification, the total number of votes for Presidential candidates from the mail-in and absentee ballots received by mail after 8 pm on Election Day and before 5 pm on November 6 was 398 (286 for Joseph Biden, 107 for Donald Trump, and 5 for Jo Jorgensen.)

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 20th day of November 2020.

/s/ J. Manly Parks

J. Manly Parks

Solicitor for Delaware County Bureau of Elections
and Voter Registration Commission